

	New Jersey Workforce Innovation Notice		WD-PY21-5
	Issued By:	Workforce Development Division of Career Services	
	Approved By:	Hugh Bailey, Assistant Commissioner Workforce Development	
	Issued Date:	December 16, 2021	

SUBJECT: Placement, Exit, and Follow-up Procedures

PURPOSE: This policy provides specific guidance regarding follow-up services for WIOA Title I Adult, Dislocated Worker, and Youth participants. This policy includes provisions from and replaces existing follow-up policies for youth included in NJWIN 1-18(Y) and NJWIN WD-PY19-1. This policy also draws on existing exit policies outlined in the NJWIN 7-15. This policy provides specific information about (1) sequencing individualized career services related to job placement, (2) exit, and (3) follow-up support and services for Adult, Dislocated Worker, and Youth participants in Title I programs.

EFFECTIVE DATE: This NJWIN is effective **Immediately.**

BACKGROUND: Follow-up services must be offered and provided as appropriate for participants after exit from Title I services for at least 12 months after exit. Follow-up services aid Youth, Adult, and Dislocated Workers as they transition and exit from Title I programs. Follow-up services are especially critical for supporting youth and ensuring their success in next step opportunities.

Follow-up services must be made available to all WIOA Title I Adult, Dislocated Worker¹, and Youth participants, as well as Trade Adjustment Assistance (TAA) participants. All participants must be informed of Follow-up Services at the time of enrollment. Follow-up Services are critical to help ensure participants have a successful employment and/or post-secondary education or training experience post program participation. Follow-up services are not required for Wagner-Peyser participants.

Exit and follow-up service start dates are determined by the last day of Individualized Career and Training Services provided to individuals. These services may include the provision of specific Individualized Career Services post-training that further support the success of individuals before

¹ TEGL 19-16 specifies that follow-up services be made available for adult and dislocated worker participants who are placed in unsubsidized employment for up to 12 months from the first day of employment. NJDOL is expanding this to include providing access to follow up services for all individuals who have received Title I Adult and Dislocated Worker services. However, this policy also encourages local areas to maintain contact and service levels as part of active service until individuals are placed in employment, which aligns with USDOL policy to provide follow-up services from the point of employment.

exit, including the provision of job search and placement activities that help to secure the placement of individuals in employment before exit. However, job search and placement activities must not be entered to delay exit if the participant is not actively engaged in these activities.

KEY DEFINITIONS

- **Post-training services:** Additional career services provided after training services have ended while a customer is still active and before exit.
- **Same-day (one-day) services and activities:** Specific funded services and activities that are entered each day that a participant receives the support rather than across multiple days. Job search, job assistance, job placement, and follow-up supports should all be added as same-day activities (job search, assistance, and placement) or same-day services (follow-up support).
- **Follow-up attempt:** One-on-one efforts to contact and connect with a prior participant after exit – whether or not a specific contact is made.
- **Follow-up service:** Direct engagement and connection to an exited participant over email, by phone, through a virtual meeting, or in person.
- **Exited WIOA:** A participant exits after the participant goes 90 days without receiving any services other than self-service, informational, or follow-up and there are no future services planned other than follow-up.
- **Date of Exit:** The last date that a non-follow-up service was provided.
- **Soft exit:** An exit that takes place because 90 days have passed without an active service.
- **Manual (hard) Exit:** An exit where an exit date is entered by local area staff because an individual meets specific criteria for an immediate exit. (See page 5 for hard exit criteria.)

POLICY OVERVIEW

Title I services can include a variety of career and training services²: (1) Individualized Career Services, (2) Training Service, and (3) Follow-up Services, as well as (4) Basic Career Services. These services provide the flexibility for meeting the needs and leveraging the assets of individual participants to support the successful employment and education outcomes of Title I participants. Although WIOA distinguishes levels of service, this distinction is not intended to imply that there is a sequence of services except for the fact that Follow-up Services must follow exit. For example, Individualized Career Services may follow Training Services during a participant's enrollment in WIOA services.

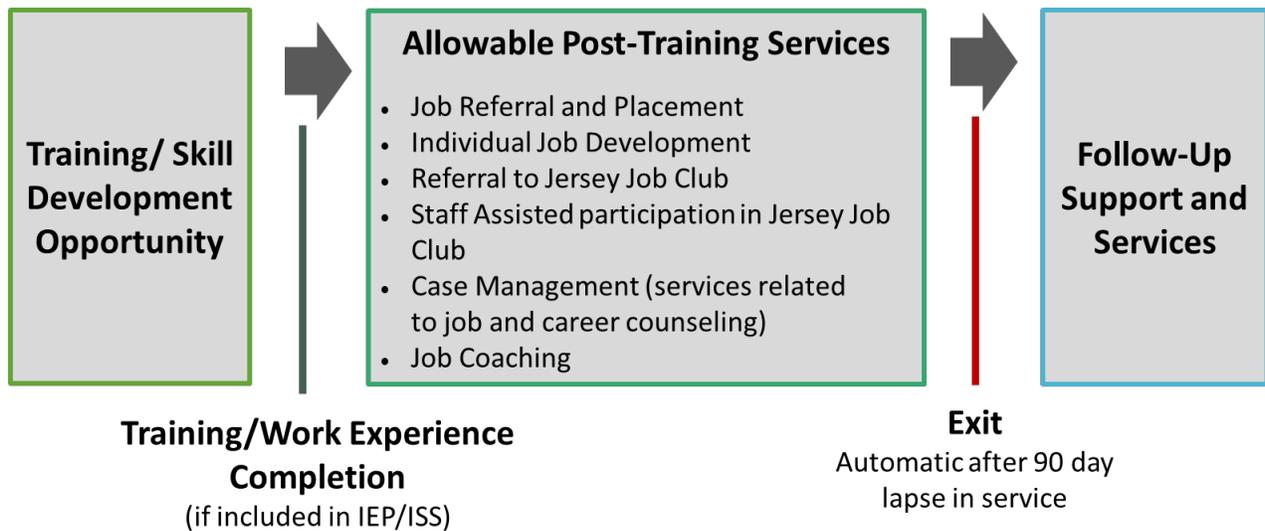
The key is that different activities and services offered align with specific employment goals and be sequenced to correspond appropriately with different phases of a participant's engagement, i.e., supporting training connection, training completion, and/or job placement. When the participant has finished completion of the service plan, the participant then exits the program, and follow-up services begin at the point of exit. Figure 1 provides an overview of the sequence of services that follow training and bridge post-training support, exit, and the follow-up period.

Note that Local WDBs providing Adult and Dislocated Worker services must seek to continue engagement of participants until they are successfully placed in employment. In other words, the ideal sequence of engagement is provision of a variety of career and training services that support successful employment during active enrollment and that follow-up services begin at the point of exit, coinciding with successful employment placement.

Please see Figure 1 on next page.

² Career services are defined in 20 CFR 678.430; rules regarding provision to adults and dislocated workers are discussed in 20 CFR 680.100-195, in sec. 134(c)(2) of WIOA, and in 20 CFR 681.580 for youth.

Figure 1: The Provision of Post-Training and Follow-up Services



While flexibility in the activities and services offered to participants can be structured in many different ways, Title I participants must have access to Follow-up Services for not less than 12 months after completion of participation. The exit date is determined when the participant has not received services in any of DOL-funded programs in which the participant is enrolled and co-enrolled for 90 consecutive days and is not scheduled for any future staff-assisted services. At that point, the date of exit is applied retroactively to the last date of service.

This follow up policy expands the 12-month follow-up requirement after exit to all Adult and Dislocated Worker participants in New Jersey, whether or not the individual is placed in unsubsidized employment or training.³ In other words, Adult, Dislocated Worker, and Youth participants must all have access to follow-up support for at least 12 months after exit and no gap should exist between exit and the beginning of follow-up services. A participant's follow-up period may extend beyond a 12-month period if needed, especially if a gap exists between exit and job placement.

³ This represents an expansion of USDOL policy that specifies: 1. Follow-up services must be provided for 12 months from the start of unsubsidized employment for Adult and Dislocated Worker participants, and 2. Follow-up services must be provided for at least 12 months post-exit for Youth participants.

Allowable Post-Training Services (prior to exit)

Local areas must provide as much support as possible during the period of participation to ensure placement in employment or post-secondary opportunities.

Upon completion of training, participants may be referred to job placement services – these may be provided by Employment Services staff, local area Title I staff, and/or training or program partner staff. These activities should offer opportunities for actively engaging participants in specific services (designated as one-day services or activities in AOSOS). According to this definition, an email or phone call in which the participant is a passive recipient would not count as a job placement service and must not be used to extend exit dates.

The following same day (one-day) services can be used to extend participation.

- Job Referral and Placement
- Individual Job Development
- Referral to Jersey Job Club (or other similar experience)
- Staff Assisted participation in Jersey Job Club (or other similar experience)
- Case Management (services related to job and career counseling)
- Job Coaching

If these elements occur within 90 days after the last planned service prior to exit, exiting can be postponed to allow for the continuation of services. Follow-up services must begin immediately following the last expected date of service, when no future services are scheduled, and does not cause the planned exit date to change or trigger re-enrollment.

About Planned Training End Dates

Exit dates do not have to align with planned training end dates if additional post-training services are provided. However, planned training end dates must be appropriate and align with the end of training.

When setting the planned training end date for an Adult or Dislocated Worker customer's training service, this date **must** be based on the duration of the training according to the individual training account agreement.

The length of training in the agreement cannot exceed the maximum duration of training provided for the program in the Eligible Training Provider List. Any modification to the Planned End Date must be accompanied with an explanation in the "Comments" tab, and appropriate documentation, as necessary.

The following activities may not be entered as post-training services or used to extend the period of participation or exit dates:

- Determination of Eligibility
- Services and activities specifically provided as follow-up services such as regular contact with the customer to obtain information regarding his or her employment status, educational progress, need for additional services, or income support payments.
- Case management services and any other required administrative case load management activities that involve regular contact with the participant.
- Income Maintenance or support payments (e.g. Unemployment Insurance, Temporary Assistance for Needy Families, other cash assistance)

Setting Exit Dates

Exit dates are set as equal to the end date of the last service received by the participant. Once a participant has not received any funded services or staff-assisted activity for 90 consecutive calendar days and is not scheduled for future services, a soft exit will occur in AOSOS. This is automatically generated by AOSOS.

Services, including same-day services, that are offered as part of a service and/or employment plan strategy should include case notes describing that service to document the active status of a participant with staff. Follow-up services should begin for Adult, Dislocated Worker and Youth participants after Exit.

As a general rule, soft exits should be based on intentional plans and decisions about when a participant is ready to exit Title I programs, based on assessment of skill development, barrier removal, goal achievement, and career pathway success:

- **Skills:** Has the individual had opportunities to develop the skills that were part of their employment plan?
- **Barriers:** Have specific barriers to employment been addressed and supported?
- **Goals:** Has the individual reached the goals they identified as part of their employment plan?
- **Career Pathway Success:** Is the individual poised for success in their identified career pathway?

In other words, soft exit dates must be planned and align with the progress and preference of participants. Local areas must manage caseloads to ensure that planned exit dates and actual soft exit dates align.

Manual (hard) exits are only allowed if one of the following participant conditions is met (Institutionalized, Health/Medical, Family Care, Deceased, Reservist Called to Active Duty, Ineligible, Retirement or Invalid Social Security Number). See NJWIN 7-15 for information about these specific categories.

Provision of Follow-Up Services

Follow-up services must offer targeted support to individuals based on identified needs. Follow-up services support transitions and the success of individuals in employment or education placements. These services are critical to sustaining growth and progress achieved during an individual's engagement in Title I programs.

Follow-up service provision varies depending on the needs of an individual, however, at minimum follow-up contact should be attempted quarterly for Adult and Dislocated Worker participants and monthly for Youth participants. In some cases, a participant may benefit from more frequent support and additional contacts may be made.

The purpose of the follow-up is to identify any problems that might jeopardize employment and to provide services (follow-up services), as appropriate, to ensure career progression and/or job retention. Follow-up supports and services vary depending on the needs of the individual customer. These services must be discussed prior to a customer's exit and meet the following criteria:

- **Follow-up services are intentional.** Discussions about follow-up supports must be integrated into development of and updates to IEPs and ISSs. Customers must be part of discussion and planning around specific follow-up goals (especially for youth) and the services that will help them support achievement of those goals.
- **Follow-up services are individualized.** Follow-up services and support must be designed in response to the individual's employment status upon exit and the unique barriers and/or opportunities that emerge for that individual.
- **Follow-up services are success-oriented.** Follow-up supports must support self-sufficiency, focus on career pathways, and help customers to achieve and maintain employment and education goals.

Follow-up may be conducted by telephone, in person, via e-mail (or other social media), or by written correspondence. Preference is for the follow-up to be through a medium that increases the probability of interaction with the participant and also increases the probability of continued contact. Follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome.⁴ Follow-up services require contact, interaction, and the provision of an acceptable follow-up service.

⁴ 20 CFR681.580

As an example, a text conversation to provide assistance with a job or work-related problem is follow-up. However, although sending a letter might be considered “following up” this is not considered a follow-up service since interaction and the provision of an actual follow-up service are required.

Follow-up Services may include, but are not limited to the following:

- Counseling individuals about the workplace;
- Contacting individuals or employers to help secure better paying jobs; additional career planning, and counseling for the individual;
- Assisting individuals and employers in resolving work-related problems;
- Connecting individuals to peer support groups;
- Providing individuals with referrals to other community resources.
- Providing individualized information about additional educational or employment opportunities

Important follow-up activities but not follow-up service.

- Contacting individuals or employers to verify employment;
- Providing individuals with generalized information about additional educational or employment opportunities; and
- Leaving voicemails or other evidence of contact that don't result in individualized service

Youth Follow-up Services

Follow-up services are a critical component of youth programs in particular. All youth participants must be advised of follow-up services at the time of enrollment and offered an opportunity to receive follow-up services. The follow-up services offered must be included in the ISS and align with the participant's goals and objectives. TEGL 21-16 outlines that follow-up services must be provided to all participants for a minimum of 12 months unless the participant declines to receive follow-up services or the participant can not be located or contacted.

The types and duration of services provided must be determined based on the needs of the individual. Therefore, the type and intensity of follow-up services may differ for each participant. Types of follow-up may include regular contact with a youth, a youth participant's employer or academic advisors, including assistance in addressing work or school related problems that arise.

Follow-up services for youth should consist of outreach to ensure that the youth participant has the needed tools to continue his/her journey. For example, specific questions may include one or more of:

- How can I help you further?
- Now that you have a job, are you saving money?

- Do you need help setting up a savings account?
- Do you need help establishing a long-term financial plan?
- Is the job you're in what you expected?
- Do you know what other opportunities are available to you within your local area?

In addition, WIOA highlights the provision of five specific program elements as follow-up services for Title I Youth participants, these include:

- Supportive services;
- Adult mentoring;
- Financial literacy education;
- Services that provide labor market and employment information about in demand industry sectors or occupations available in the local area, such as career awareness, career counseling (including counseling about the workplace as appropriate), and career exploration services; and
- Activities that help youth prepare for and transition to post-secondary education and training.

Supportive Services in Follow-Up

Supportive services can be provided to WIOA title I Youth during program participation and during follow-up services. However, supportive services are only available to active Adult/Dislocated Worker WIOA participants as outlined in TEGL 19-16.

Adult/Dislocated Worker participants identified as needing ongoing supportive services must still be participating in career services (other than follow-up), training activities, or both to continue to receive supportive services.

Program elements and services defined beyond the above five program elements allowed as part of follow-up are not permitted during the follow-up period. To provide such services, the youth must be re-enrolled and a new eligibility determination completed.

Note: For a description of these services, see the [Youth Program Technical Assistance Guide](#), which was provided in [New Jersey Workforce Innovation Notice 6-17](#).

Follow-up Contingencies

Follow-up services must be provided to all participants for 12 months, with some exceptions that may apply. The exceptions are listed below.

Informed Choice to Discontinue: For adults, dislocated workers, and youth, follow-up service may be discontinued if the participant indicates that they no longer need or want the follow-up contact. The participant must send an email or a writing indicating the participant's desire not to be contacted further. Service provider staff shall not solicit this request. The individual may

opt out of receiving follow-up at any point during the program or during the follow-up period. Opting out must be documented in a comment in AOSOS, as well as in the paper file. Opting out must be an informed and active choice of the participant that is based on full knowledge of the supports and services to which an individual has access. In cases, where an individual verbally expresses a choice to discontinue and is unwilling to submit written notice, this must be documented in a comment in AOSOS.

Several Failed Attempts: Follow-up services must include a minimum of quarterly attempts to contact Adult/Dislocated Worker participants and monthly attempts to contact Youth participants. If after multiple follow-up attempts, no contact is made within the first six months, follow-up services may be terminated. Attempts must have been made to all telephone numbers and through at least one other medium. Additionally, comments, activities, and services in AOSOS must document: (1) the number of failed contacts attempts and efforts made to encourage engagement, (2) the types of contact made, and (3) the services/support offered to the participant.

Extension of Follow-up: For adults, dislocated workers, and youth, follow-up services may be provided beyond 12 months at a local area's discretion. Follow-up may continue if the participant has still not met self-sufficiency and, in the opinion of local area staff, additional progress can be obtained through continued follow-up. Furthermore, for Adult and DW participants, a gap between exit and placement might result in a follow-up period that extends beyond 12 months. All of this must be documented via comments in AOSOS.

Local Follow-up Policies

Each local area must develop and approve a follow-up policy that specifies:

- Allowable follow-up services in your local area for Youth, Adult, and Dislocated Worker participants who have exited
- Specific tools for assessing and identifying follow-up supports, including follow-up agreements established during active engagement
- Opt-out procedures for Youth participants, include templates for participants to decline follow-up services
- Protocols around follow-up attempts, including when failed attempts are sufficient to discontinue follow-up services, as well as, specific expectations around the documentation of these attempts and decisions
- Procedures for how to document approvals and provision of follow-up services provided beyond 12 months

Local policies must be used to establish specific local details about follow-up policies and procedure related to opt-out, discontinuation of follow-up services based on failed attempts, and extended follow-up opportunities. Specifically, opt-outs and discontinuations of follow-up services are not allowed, if no local policy exists specifying follow-up policies and procedures.

Additional categories of youth for whom follow-up services are not required per TEGL 10-16

- The participant exits the program because he or she has become incarcerated in a correctional institution;
- The participant has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center while receiving services as a participant;
- The participant is deceased;
- The participant exits the program because of medical treatment, and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program;
- The participant exits the program because the participant is a member of the National Guard or other reserve military unit of the armed forces, and is called to active duty for at least 90 days; or
- The participant is in the foster care system as defined in 45 CFR 1355.20(a), and exits the program because the participant has moved from the local workforce area as part of such a program or system.

Follow-up Documentation in AOSOS

Documenting Follow-up Attempts

Specific attempts to follow-up with a customer after exit must be documented as an activity in the Activities tab in Customer Detail.

When documenting...	Please enter the following activity....
An attempt to follow-up and make contact with a customer	Follow-up Attempted

Counselors and other staff must use this activity to document making follow-up attempts even if connection and specific follow-up services are not offered. In addition, additional details about these attempts, must be documented in Comments in the Services tab – including information about the medium used to attempt contact and any specific information provided.

Recording Follow-up Services

A same-day follow-up service should be entered each time a customer engages directly in additional contact and receives support during the follow-up period. Follow-up can be entered as a generic follow-up service, however additional details about the nature of the follow-up engagement must be recorded in the Outcome/Status field of the “Achievement Objectives” tab in the Services module.

About Same Day Services

Follow-up services must always be entered as a same-day service, in other words the actual start and end dates should reflect the same date.

Entry of a same day follow-up service indicates direct contact and support of a customer.

Follow-up services must be attempted quarterly for Adult/DW participants and monthly for Youth participants. When these attempts result in service, a same day follow-up service must be entered.

In addition to entering a general follow-up service and details, five program elements are specifically allowable as part of youth follow-up services: Supportive Services, Adult Mentoring, Financial Literacy Education, services that provide Labor Market & Employment Information, and activities that help youth prepare for and transition to post-secondary education and training. Specific SSTs associated with these program elements (highlighted on page 10 in the AOSOS Technical Guide for Title I Service Delivery) can be entered as specific services provided as part of follow-up.

As with other services, specific details about these follow-up services should be captured in the Outcome/Status field of the “Achievement Objectives” tab. Please see the AOSOS Technical Guide: Title I Service Delivery for more details about how to ensure service details are captured in the “Achievement Objectives” tab. Specifically, this Outcome/Status field must be used to capture details about individual dates of follow-up connection, duration of connection with client, topics discussed, and specific supports provided.

Additional Follow-up Documentation

In addition to documenting follow-up attempts as activities and follow-up services and details as same-day services in the Achievement Objectives tab, additional information must be documented in comments.

Overall, an AOSOS record should offer a clear picture of follow-up attempts and support individuals through recorded follow-up activities, same day service entries, details recorded in Achievement Objectives, and additional notes in the Comments tab in Services.

Specifically, if follow-up services and attempts are terminated, a comment summarizing follow-up attempts and support must be recorded in Comments in the Services tab. Furthermore, termination practices must be consistent with a local areas follow-up policy. In other words, documented attempts must correspond with requirements highlighted in the local follow-up policy.

Lastly, supplemental data relevant to training and employment outcomes must be collected during follow-up. This includes information about personal contact information (address, phone, other contact numbers, name changes), credential attainment (status), and employment (employer, wages, hours and position). If related to training completion or credential attainment, this information must be entered in the Training Outcomes tab. If information is related to employment, this information must be entered in the Employment Outcomes tab. Changes to personal contact information must be documented in the Customer Detail module. Additionally, back-up documentation of training and employment outcomes must be included in paper files.

Final Close-Out Steps: After the 12-month follow-up is completed, all files are to be reviewed again for accuracy in all areas (eligibility documentation, ISS/action plan, Case Notes) before the participant name is removed from the case manager's caseload list and the file is placed into storage. Exit files must be retained for no less than seven years.

References:

- WIOA 20 CFR 678.430
- WIOA 20 CFR 680.100-195
- WIOA 20 CFR 681.580
- TEGL 10-16 Change 1: https://wdr.doleta.gov/directives/attach/TEGL/TEGL_10-16-Change1.pdf (page 34)
- TEGL 19-16: https://wdr.doleta.gov/directives/attach/TEGL/TEGL_19-16_acc.pdf
- TEGL 21-16: https://wdr.doleta.gov/directives/attach/TEGL/TEGL_21-16_Acc.pdf (page 19)
- Youth Program Technical Assistance Guide: [Microsoft Word - WIOA Youth Program Elements Technical Assistance Guide.docx \(nj.gov\)](#)

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